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7 *Attorneys for Plaintiff, Wells Fargo Bank, National Association, as Trustee for Morgan Stanley
8 Capital I Inc. Trust 2006-HE1, Mortgage Pass-Through Certificates, Series 2006-HE1*

8
9 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 WELLS FARGO BANK, NATIONAL
11 ASSOCIATION, AS TRUSTEE FOR
12 MORGAN STANELY CAPITAL I INC.
13 TRUST 2006-HE1, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2006-
14 HE1,

15 Plaintiff,

16 vs.

17 WESTCOR LAND TITLE INSURANCE
18 COMPANY; DOE INDIVIDUALS I through
X; and ROE CORPORATIONS XI through
XX, inclusive,

19 Defendants.

20 Case No.: 2:21-cv-00326-JCM-BNW

21
22 **STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTION TO DISMISS [ECF No. 6]**

23
24 **[Second Request]**

25 Plaintiff, Wells Fargo Bank, National Association, as Trustee for Morgan Stanley
26 Capital I Inc. Trust 2006-HE1, Mortgage Pass-Through Certificates, Series 2006-HE1 (“Wells
27 Fargo”) and Defendant Westcor Land Title Insurance Company (“Westcor”), by and through
28 their counsel of record, hereby stipulate and agree as follows:

- 25 1. On January 22, 2021, Wells Fargo filed its Complaint in Eighth Judicial District
26 Court, Case No. A-21-828236-C [ECF No. 1-1];
- 27 2. On February 26, 2021, Westcor filed its Petition for Removal to this Court [ECF No.
28 1];

3. On March 5, 2021, Westcor filed a Motion to Dismiss [ECF No. 6];
4. Wells Fargo's deadline to respond to Westcor's Motion to Dismiss is currently April 19, 2021 [ECF No. 9];
5. Wells Fargo's counsel is requesting a brief, one-week extension until April 26, 2021, to file its response to the pending Motion to Dismiss;
6. This extension is requested to allow Wells Fargo additional time to finalize and file its response to the pending Motions to Dismiss.
7. Counsel for Westcor does not oppose the requested extension;
8. This is the second request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

12 DATED this 16th day of April, 2021.

DATED this 16th day of April, 2021.

13 WRIGHT, FINLAY & ZAK, LLP

MAURICE WOOD

/s/ Brittany Wood
Brittany Wood, Esq.
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*Attorney for Defendant, Westcor Land Title
Insurance Company*

21 | IT IS SO ORDERED.

Dated April 19, 2021.

James C. Mahan
UNITED STATES DISTRICT COURT JUDGE